

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division

UNITED STATES OF AMERICA

v.

Criminal No.: 2:24-cr-20

SHANNON ROBBINS,

Defendant.

**DEFENDANT'S UNOPPOSED MOTION TO
CONTINUE SENTENCING**

NOW COMES the Defendant, Shannon Robbins (the "Defendant"), by counsel, and respectfully moves this Court for entry of an order continuing the sentencing, currently set for February 28, 2025 at 1100AM. In support of this Motion, the counsel avers the following:

1. On February 3, and February 5, 2025, counsel for the government provided Defense Counsel with additional information regarding alleged relevant conduct, pertinent to this sentencing hearing.
2. Counsel has had an opportunity to review same with the Defendant prior to this date.
3. Counsel lives in southeastern Virginia Beach, which is under emergency weather conditions beginning February 19, 2025 (Wednesday) due to significant and unusual snowfall for the area.
4. Counsel had scheduled to complete Defendant's memorandum on sentencing and review same with Mr. Robbins prior to filing on February 21, 2025.
5. Unfortunately, weather conditions, school closures and daycare closures, very likely through the remainder of the work week, render travel unsafe to Western Tidewater

Regional Jail, and because of family obligations, render this Counsel without reasonable capacity to lend effective and thorough assistance to Mr. Robbins leading into his sentencing hearing.

6. Counsel for the Government has no objection to this motion.

WHEREFORE, the Defendant, by counsel, respectfully requests entry of an order continuing this sentencing hearing.

I ask for this:

 /s/
Brian M. Latuga, Esquire
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Counsel for Defendant Shannon Robbins

CERTIFICATE OF SERVICE

I hereby certify on the 20th day of February, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
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